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13 **IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

14 C.M., on her own behalf and on behalf of her  
15 minor child, B.M.; L.G., on her own behalf and  
16 on behalf of her minor child, B.G.; M.R., on her  
17 own behalf and on behalf of her minor child,  
J.R.; O.A., on her own behalf and on behalf of  
18 her minor child, L.A.; and V.C., on her own  
behalf and on behalf of her minor child, G.A.,

No. 2:19-CV-05217-PHX-SRB

**FOURTH STIPULATED  
MOTION TO HOLD  
ACTION IN ABEYANCE**

19 Plaintiffs,

20 v.

21 United States of America,

22 Defendant.

23  
24 A.P.F. on his own behalf and on behalf of his  
25 minor child, O.B.; J.V.S. on his own behalf and  
26 on behalf of his minor child, H.Y.; J.D.G. on his  
27 own behalf and on behalf of his minor child,  
M.G.; H.P.M. on his own behalf and on behalf of  
28 his minor child, A.D.; M.C.L. on his own behalf

No. 2:20-CV-00065-PHX-SRB

1 and on behalf of his minor child, A.J.; and R.Z.G.  
2 on his own behalf and on behalf of his minor  
3 child, B.P.,

4 Plaintiffs,  
5  
6 v.  
7  
8 United States of America,  
9  
10 Defendant.

11  
12 The parties jointly move the Court for an order holding this action in abeyance  
13 for an additional period of sixty (60) days while the parties continue to engage in  
14 settlement negotiations. In support of this motion, the parties respectfully state the  
15 following:

16 On June 1, 2021, the parties moved the Court to hold the action in abeyance for  
17 an additional sixty (60) days for the parties to continue to focus their attention on their  
18 ongoing settlement efforts. *C.M.* ECF 107; *A.P.F.* ECF 105. On June 1, 2021, the  
19 Court granted that motion, holding the case in abeyance until August 2, 2021, at  
20 which time the parties were to advise the Court whether an additional abeyance was  
21 sought. *C.M.* ECF 108; *A.P.F.* ECF 106.

22 The parties have made substantial progress in settlement discussions, but  
23 require additional time for ongoing discussions. The parties, along with additional  
24 plaintiffs' counsel, who are coordinating negotiations on behalf of plaintiffs and  
25 claimants, are engaged in a nationwide effort to settle district court cases and pending  
administrative tort claims arising from family separations at the U.S./Mexico border  
that occurred during the prior administration. While significant progress has been  
made, due to the scale and complexity of the effort, additional time is needed to  
achieve a global resolution of these matters.

26 In order to facilitate continued progress, the parties respectfully move the  
27 Court for an order holding this action, including all proceedings and case deadlines, in  
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abeyance for an additional period of sixty (60) days, for the parties to continue to focus their attention on these settlement efforts. The parties propose that, at the close of this additional 60-day abeyance period, the parties may, depending on the progress of the settlement discussions, seek an additional abeyance from the Court. If an additional abeyance is not sought, the parties request that any existing deadlines be reset for an additional sixty (60) days—thus a total of one-hundred sixty-four (164) days—from the current deadlines.

Counsel for Plaintiffs and the United States have conferred regarding this request and agreed to jointly move the Court to hold this action in abeyance. The party submitting this motion has obtained the permission of all signatories hereto. A proposed Order is submitted herewith.

Respectfully submitted this 2nd day of August, 2021.

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24 \* *Admitted pro hac vice*  
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1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on Augusts 2, 2021, I electronically transmitted the attached  
3 document to the Clerk's Office using the CM/ECF System for filing and transmittal of  
4 a Notice of Electronic Filing to all CM/ECF registrants.

5  
6 s/ Philip D. MacWilliams  
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